

April 18, 2022

**Via ECF**

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *Chemoil Corp. v. United States of America*, 19-cv-6314 (ALC) (JEW)**


Dear Judge Carter:

Pursuant to the parties' last status report, submitted March 17, 2022, the parties jointly write to provide the Court with an update on the parties' settlement negotiations.

In their March 17, 2022, joint status letter, the parties noted that they were evaluating their respective positions, as well as the most efficient path forward. Since that date, Chemoil presented to the United States more detailed explanations of its legal positions regarding two of the United States' arguments, which the parties discussed via telephone on April 5, 2022. Chemoil has been considering the United States' positions since that discussion and requires additional time to respond substantively with its goal to either advance the settlement discussions or narrow the issues for trial.

The parties therefore respectfully propose that they provide another status update to the Court in one week, by Monday, April 25, 2022. Thank you for your consideration of this request.

Respectfully submitted,



Sarah E. Paul

cc: Counsel for the United States (via ECF)